

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

(1) KEVIN COMBS #18-00995
 (Name of Plaintiff) (Inmate Number)
FRANKLIN COUNTY JAIL
1804 OPPORTUNITY AVE, CHAMBERSBURG, PA 17201
 (Address)

(2) _____
 (Name of Plaintiff) (Inmate Number)

 (Address)

(Each named party must be numbered,
and all names must be printed or typed)

vs.

(1) MICHELLE WELER
 (2) SALINDA DICKINSON
 (3) JANE / JOHN DOE
 (Names of Defendants)
(SUED IN THEIR INDIVIDUAL CAPACITIES)
 (Each named party must be numbered,
and all names must be printed or typed)

TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS
☐ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

THIS INFORMATION CAN NOT BE PROVIDED BY PLAINTIFF KEVIN
COMBS 1804 OPPORTUNITY AVE, CHAMBERSBURG, PA 17201 BECAUSE
HE HAS BEEN SEPERATED FROM HIS LEGAL PAPERWORK/DOCUMENTS
AND PREVENTED FROM GETTING THEM BACK BY DEFENDANTS
AND CO CONSPIRATORS OF THE FRANKLIN COUNTY SHERIFFS OFFICE
AND COURTHOUSE.

JURY TRIAL
DEMANDED

3:18cv1713
 (Case Number)

CIVIL COMPLAINT

FILED
SCRANTON

AUG 29 2018

PER

DEPUTY CLERK

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ☒ Yes ☐ No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ☒ Yes ☐ No HOWEVER ALL OF MY GRIEVANCES AND DOCUMENTS HAVE BEEN CONFISCATED BY SUBORDINATES OF DEFENDANTS AT FRANKLIN COUNTY JAIL.
- C. If your answer to "B" is Yes: FRANKLIN COUNTY JAIL.
1. What steps did you take? FILED REQUEST SLIPS AND GRIEVANCES AND GRIEVANCE APPEALS TO THE LAST AND FINAL STEP.
 2. What was the result? ALL DENIED
- D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS

- (1) Name of first defendant: MICHAELLE WELLER
 Employed as DEPUTY WARDEN at FRANKLIN COUNTY JAIL
 Mailing address: 1804 OPPORTUNITY AVE, CHAMBERSBURG, PA 17201
- (2) Name of second defendant: SALINDA DICKINSON
 Employed as RECORDS DEPT OFFICIAL at FRANKLIN COUNTY JAIL
 Mailing address: 1804 OPPORTUNITY AVE, CHAMBERSBURG, PA 17201
- (3) Name of third defendant: JANE/JOHN DOE
 Employed as RECORDS DEPT OFFICIAL at FRANKLIN COUNTY JAIL
 Mailing address: 1804 OPPORTUNITY AVE, CHAMBERSBURG, PA 17201

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. ON 6-14-18 PLAINTIFF WAS TRANSPORTED FROM LACKAWANNA COUNTY PRISON TO FRANKLIN COUNTY JAIL PURSUANT TO A "TRANSPORT ORDER / WRIT" FOR OVERNIGHT COURT TO COMPLY WITH A SUBPOENA TO APPEAR BEFORE AN INVESTIGATIVE GRAND JURY MD-516-2018, AT THE FRANKLIN COUNTY

- COURTHOUSE, ON 6-15-18, PLAINTIFF APPEARED BEFORE THE FRANKLIN COUNTY PRESIDENT JUDGE CAROL VAN HORN, AND DISTRICT ATTORNEY MATTHEW FOGAL. THE PRESIDENT JUDGE INFORMED PLAINTIFF THAT HE
2. WAS GRANTED AN IMMUNITY ORDER IN EXCHANGE FOR HIS TESTIMONY. IN RESPONSE, PLAINTIFF STATED THAT HE DID NOT WANT TO BE THERE AND EXERCISED HIS RIGHT TO AN ATTORNEY, AND PUBLIC DEFENDERS WERE ASSIGNED. AFTER ENGAGING IN CONFIDENTIAL COMMUNICATIONS WITH THE P.D. WHICH WERE BREACHED. THE DISTRICT ATTORNEY, MATTHEW FOGAL, PREVENTED PLAINTIFF FROM APPEARING BEFORE THE GRAND JURY AFTER BEING PUT ON NOTICE THAT PLAINTIFF INTENDED TO REFUSE TO TESTIFY, BE HELD IN CONTEMPT, AND CHALLENGE THE PROPERITY OF THE GRAND JURY ARRAY AND SUBPOENA THROUGH CONTEMPT PROCEEDINGS.
 3. IN RESPONSE TO THE PLAINTIFF EXERCISING HIS RIGHT TO AN ATTORNEY AND PLAINTIFFS INTENTIONS TO EXERCISE HIS RIGHT TO CHALLENGE THE GRAND JURY. PLAINTIFF BECAME THE TARGET OF A NUMBER OF UNLAWFUL TACTICS DESIGNED TO EXFORT PLAINTIFFS TESTIMONY BEFORE GRAND JURY MD-S16-2016 TO INCLUDE A CONSPIRACY TO KEEP PLAINTIFF UNLAWFULLY CONFINED AT THE F.C.J. PURSUANT TO A "TRANSPORT ORDER/WRIT" FOR OVERNIGHT COURT AND GRAND JURY SUBPOENA, AS OPPOSED TO A VALID AND LAWFUL COMMITMENT ORDER

SEE ATTACHED PAGES → CONT.
3A 3B 3C

V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. PLAINTIFF IS REQUESTING THAT THE COURT AWARD DAMAGES (COMPENSATORY DAMAGES AND PUNITIVE DAMAGES ECT.). PLAINTIFF RESERVES HIS RIGHT TO REQUEST A SPECIFIC DAMAGE AMOUNT.
2. PLAINTIFF IS REQUESTING THAT THE COURT GRANT INJUNCTIVE RELIEF, TO CEASE THE CONTINUED AND ON-GOING ACTS OF VIOLATIONS OF PLAINTIFFS RIGHTS.
3. PLAINTIFF IS REQUESTING THAT THE COURT GRANT DECLARATORY JUDGEMENTS.

AFTER BEING PREVENTED FROM APPEARING BEFORE THE GRAND JURY, PLAINTIFF WAS ESCORTED TO THE COURTHOUSE HOLDING CELLS. AT WHICH TIME PLAINTIFF INQUIRED AS TO WHEN HE WOULD BE TRANSPORTED BACK TO LACKAWANNA COUNTY PRISON (LCP). PLAINTIFF WAS INFORMED BY SGT. RONALD GEYER JR. OF THE FRANKLIN COUNTY SHERIFFS DEPT. THAT CHANGES WERE BEING MADE AS WE SPEAK, THAT HE HAD TO GO SPEAK WITH THE D.A. / HIGHER UP TO FIND OUT EXACTLY WHAT TO DO WITH PLAINTIFF. UPON HIS RETURN PLAINTIFF WAS INFORMED BY SGT. RONALD GEYER JR. THAT INVESTIGATIVE GRAND JURY MD-516-2016 WAS RESCHEDULED UNTIL FRIDAY JULY 13, 2018. THAT PLAINTIFF WOULD NOT BE TRANSPORTED BACK TO (LCP) AS PROMISED BECAUSE THE DA AND HIGHER-UPS INSTRUCTED SGT. GEYER JR. TO ~~KEEP~~ KEEP PLAINTIFF HOUSED AT THE (FCTJ), AND THE (LCP) RECORDS DEPT. GAVE GEYER JR. PERMISSION. TO DO SO.

SGT. GEYER JR. FURTHER INFORMED PLAINTIFF THAT THIS WAS HAPPENING TO PLAINTIFF BECAUSE HE DIDN'T TELL THE INVESTIGATIVE GRAND JURY AND MATTHEW FOGAL WHAT IT IS THEY WANT TO KNOW, THAT IF PLAINTIFF WANTED TO BE TRANSPORTED BACK TO (LCP) HE BETTER TELL THE HIGHER-UPS WHAT THEY WANT TO KNOW. PLAINTIFF WAS TRANSPORTED ~~TO (FCTJ)~~ TO (FCTJ)

ONCE BACK AT (FCTJ) PLAINTIFF BEGAN SUBMITTING INMATE REQUEST SLIPS AND GRIEVANCES COMPLAINING OF HIS ILLEGAL AND UNAUTHORIZED CONFINEMENT AS FOLLOWS:

ON 6-20-18 PLAINTIFF SUBMITTED REQUEST SLIP TO (FCTJ) RECORDS DEPT COMPLAINING OF UNAUTHORIZED CONFINEMENT AND RISK OF PLAINTIFF MISSING LEGAL DEADLINES IN OTHER COURTS JURISDICTIONS. PLAINTIFF ALSO REQUESTED TO BE TRANSPORTED BACK TO (LCP). ON 6-26-18 DEFENDANT JANE/JOHN DOE RESPONDED

PG.
3-B

"You will BE TRANSPORTED BACK"

AGAIN ON 6-20-18 PLAINTIFF SUBMITTED INMATE REQUEST TO (FCT) DEPUTY WARDEN MICHELLE WELER (DEF. WELER) COMPLAINING OF UNAUTHORIZED CONFINEMENT AND RISK OF MISSING LEGAL DEADLINES IN OTHER COURT JURISDICTIONS. PLAINTIFF ALSO REQUESTED TO BE TRANSPORTED BACK TO (LCP).

ON 6-21-18 DEF. WELER RESPONDED:

"FRANKLIN COUNTY SHERIFFS WILL BE DOING YOUR TRANSPORT THEY WERE NOTIFIED AFTER YOUR COURT DATE TRANSPORT SCHEDULE DETERMINED BY THEM { NOT THE JAIL"

ON 6-27-18 PLAINTIFF SUBMITTED ANOTHER REQUEST SLIP TO DEF. WELER COMPLAINING THAT PLAINTIFF WAS AT RISK OF IRREPARABLE HARM UPON MISSING UPCOMING DEADLINES THEREFORE, PLAINTIFF REQUESTED ALL DOCUMENTATION AUTHORIZING HIS CONFINEMENT AT (FCT), IF NO AUTHORIZED DOCUMENTS EXIST PLEASE STATE SO IN RESPONSE.

ON 6-28-18 DEF WELER RESPONDED:

"YOU ARE TO BE TRANSPORTED BY THE SHERIFF'S AND THEY ARE AWARE FCT DOES NOT DICTATE SHERIFF SCHEDULES"

AGAIN ON 6-27-18 PLAINTIFF SUBMITTED ANOTHER REQUEST SLIP TO RECORDS COMPLAINING THAT PLAINTIFF IS AT RISK OF IRREPARABLE HARM UPON MISSING UPCOMING DEADLINE. THEREFORE PLAINTIFF REQUESTED ALL DOCUMENTATION PURPORTING TO AUTHORIZE HIS CONFINEMENT AT (FCT), IF NO AUTHORIZED DOCUMENTS EXIST PLEASE STATE SO IN RESPONSE.

ON 7-9-18 DEF SALINDA DICKINSON OF RECORDS RESPONDED;

"THIS HAS BEEN ADDRESSED"

PG.
3-B

PG:

3-C

ON 7-3-18 PLAINTIFF WROTE A THREE (3) PAGE FORMAL COMPLAINT ATTACHED TO AN INMATE REQUEST SLIP ON 7-5-18 TO (1) THE FRANKLIN COUNTY SHERIFF, (2) THE FRANKLIN COUNTY COMMISSIONER, (3) THE FRANKLIN COUNTY JAIL WARDEN, AND (4) THE FRANKLIN COUNTY JAIL RECORDS DEPT. COPIES WERE ALSO FORWARDED TO PLAINTIFFS IMMEDIATE FAMILY, THE PUBLIC DEFENDERS OFFICE AND THE FRANKLIN COUNTY PRESIDENT JUDGE CAROL VAN HORN.

THE SHERIFF, COMMISSIONER, AND JAIL WARDEN DID NOT RESPOND. HOWEVER, ON 7-9-18 DEF. SALINDA DICKINSON OF RECORDS RESPONDED: (SEE EXHIBIT-~~E~~) ATTACHED HERETO.

"WE HAVE ON FILE AN ORDER FROM JUDGE VAN HORN DATE EFFECTIVE 6-15-18 THAT YOU ARE TO REMAIN HOUSED AT FRANKLIN CO JAIL PENDING YOUR REQUIRED TESTIMONY ON 7/13"

PLAINTIFF REMAINED SO UNLAWFULLY CONFINED BY DEFENDANTS AT (FCJ) WITHOUT A COMMITMENT ORDER OR LAWFUL AUTHORITY FROM 6-15-18 UNTIL 7-13-18. AS A "GRAND JURY SUBPOENA" NOR "TRANSPORT ORDER/WRIT" FOR OVERNIGHT COURT, ~~THE~~ ~~NOT~~ CONSTITUTES SUFFICIENT DOCUMENTATION AUTHORIZING PLAINTIFFS CONFINEMENT AT (FCJ) DURING SUCH TIME.

THE ABOVE DESCRIBED ACTS AND/OR OMISSIONS DEMONSTRATE THAT THE DEFENDANTS, DESPITE HAVING KNOWLEDGE ACTED WITH RECKLESS DISREGARD AND/OR DELIBERATE INDIFFERENCE TO PLAINTIFFS STATE AND FEDERAL RIGHTS. THE DEFENDANTS ACTED WILLFULLY IN DEPRIVING PLAINTIFF OF HIS RIGHTS BY WAY OF FALSE PROMISES INCONSISTANT STATEMENTS, AND MISREPRESENTATIONS IN THE FURTHERANCE OF A CONSPIRACY, RETALIATION, UNLAWFUL DETENTION & SEIZURE, FALSE ARREST, FALSE IMPRISONMENT, ABUSE OF PROCESS, DENIAL OF COURT ACCESS, PROCEDURAL AND SUBSTANTIVE DUE PROCESS. VIOLATION

PG:

3-C

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 27 day of AUGUST, 20 18.


(Signature of Plaintiff)

REQUEST SLIP

- 1). DEFENDANT DICKINSON ^{REQUEST SLIP} RESPONSE ATTACHED HERETO AS
(EXHIBIT-E)
- 2). UNAUTHORIZED CONFINEMENT GRIEVANCE FULLY EXHAUSTED
ATTACHED HERETO AS (EXHIBIT-R)
- 3). CONSPIRACY GRIEVANCE AGAINST DEFENDANT DICKINSON AND
CO-CONSPIRATOR FULLY EXHAUSTED ATTACHED HERETO AS
(EXHIBIT-S)



Franklin County Jail

Inmate Request Slip

Inmate's Name: <u>KEVIN COMBS</u>	Housing Location: <u>D-13</u>	Date: <u>7-5-18</u>
Check One:		
<input type="checkbox"/> Chaplain	<input type="checkbox"/> Classification	<input type="checkbox"/> Correctional Treatment Specialist (CTS)
<input type="checkbox"/> Mental Health	<input type="checkbox"/> Probation	<input type="checkbox"/> Programs (name) _____
<input type="checkbox"/> Property Clerk	<input type="checkbox"/> Public Defender	<input checked="" type="checkbox"/> Records
<input type="checkbox"/> Treatment	<input type="checkbox"/> Work Programs	<input type="checkbox"/> Other _____
Name (if known) _____		

Instructions: Fill out Form completely and print legibly. Provide a brief and detailed description of your question, concern, or problem. Failure to be specific may result in no action being taken. Cite only (1) question, concern, or problem. (Multiple requests require separate Inmate Request Slips)

RECORDS

PLEASE SEE ATTACHED FORMAL WRITTEN
COMPLAINT THREE (3) PAGES TOTAL.

Inmate's Signature: Kevin Combs

For Official Use Only:

Forwarded to: <u>Records</u>	Forwarded By: <u>ODD</u>	Date: <u>7-6-18</u>
<input type="checkbox"/> APPROVED	<input type="checkbox"/> DISAPPROVED	<input type="checkbox"/> NEED MORE INFORMATION
<input type="checkbox"/> SEE ATTACHMENT(s)		

Response:

We have on file; an order from Judge Van Horn
dated & effective 6/15/2018 that you are to remain housed
at Franklin Co Jail pending your required testimony on 7/13.

Staff Signature and Title: SD

Date: 7/9

RECEIVED

AUG 7 1 REC'D

FRANKLIN CO JAIL

Franklin County Jail

Inmate Grievance Form

For Official Use Only

18-00673

Grievance Number

Rec 6/28/18 E#

Inmate Name: KEVIN COMBS	Date: 6-27-18
Signature: <i>Kevin Combs</i>	Housing Location (Unit & Cell): DELTA - 13

Grievance Issues: (Check all that Apply)

- ☒ Alleged violation of civil or constitutional rights
☒ Alleged violation of jail policy
☒ Alleged criminal or prohibited act by a staff member
☐ Alleged condition existing within the facility that creates unsafe or unsanitary conditions
☐ Dispute about the assessment of a specific fee or service charge

Instructions:

1. No grievance shall be considered that deals with the amount of your bond, matters concerning your court case, probation and parole decisions, disciplinary hearings and classification hearings. No grievance will be entertained from a group or representative of any group. All grievances will be on an individual basis.
2. Grievances must be filed within five (5) days after a potential grievable event has occurred.
3. State grievance completely and thoroughly. Grievance Form will be returned to you if it is not completed properly.
4. Grievances containing obscene language, threats or vulgar remarks will not be accepted. Inmates may be subject to disciplinary action for remarks made within the grievance and no immunity will be afforded to any inmate from civil or criminal liability for any of their acts or statements.

Statement of Grievance: Additional paper may be used, maximum of two pages. (One Inmate Grievance Form and one one-sided 8 1/2 x 11 page)

ON 6-19-18 I WAS TRANSPORTED FROM THE LACKAWANNA COUNTY PRISON TO THE FRANKLIN COUNTY JAIL, PURSUANT TO A WRIT ORDER (WRIT) FOR OVER NIGHT COURT FOR A COURT DATE OF 6-15-18, WHICH HAS PASSED. BEFORE TRANSPORT I WAS ADVISED BY THE FRANKLIN COUNTY TRANSPORT SHERIFFS TO LEAVE ALL MY LEGAL PAPERWORK AND DOCUMENTS AT THE LACKAWANNA COUNTY PRISON. I WOULD BE BACK BY "MON OR TUES". I HAVE BEEN MISSING LEGAL LITIGATION AND DEADLINES IN OTHER JURISDICTIONS BECAUSE I HAVE MISSED AS A RESULT OF THIS UNAUTHORIZED CONFINEMENT. FROM MY LEGAL DOCUMENTS, THIS JAIL IS REQUIRED TO MAINTAIN VALID AND UPDATED COMMITMENT ORDERS. I AM CURRENTLY CONTAINED AT THIS JAIL WITHOUT PROPER AUTHORITY, IN VIOLATION OF MY STATE AND FEDERAL RIGHTS, AND I WILL SUFFER IRREPARABLE HARM UPON MISSING LEGAL DEADLINES AS A RESULT OF THIS UNJUSTIFIED CONFINEMENT.

List actions taken and staff you have contacted, before submitting this grievance.

I HAVE SPOKE TO THE CORRECTIONAL TREATMENT SPECIALIST, WROTE AN INMATE REQUEST SLIP TO RECORDS DEPARTMENT, AND INMATE REQUEST SLIP TO DEPUTY WARDEN WELER.

Franklin County Jail

Inmate Grievance Form

Step 1 - Correctional Treatment Specialist Response: (Must respond within 10 business days)

These concerns would be better addressed with your Attorney

Signature

Date

☒ Decision Appealed by Inmate KEVIN COMBS (Date) 7/16/18

Rec 7/17/18 NUN

Explain why:

BECAUSE THE GRIEVANCE RESPONSE IS UNCLEAR, EVASIVE, AND VAGUE. WHY IS IT THAT NO SUPERVISORY OFFICIALS OF THE JAIL WILL DIRECTLY ADDRESS WHY I HAVE BEEN CONFINED AT THIS JAIL WITHOUT A COMMITMENT ORDER FROM 6-15-18 TO 7-14-18 WHICH RESULTS IN A VIOLATION OF MY STATE AND FEDERAL CONSTITUTIONAL RIGHTS. "WHY?"

Step 2 - Deputy Wardens Responses or Designees: (Must respond within 10 business days)

Transports scheduled by Sheriff's Office

Signature

Date

Signature

Date

☒ Decision Appealed by Inmate KEVIN COMBS (Date) 7/25/18

Rec 7/26/18 NUN

Explain why:

BECAUSE THE GRIEVANCE RESPONSES ARE UNCLEAR, EVASIVE, AND VAGUE. WHY IS IT THAT NO SUPERVISORY OFFICIALS OF THE JAIL WILL NOT DIRECTLY ADDRESS WHY I HAVE BEEN CONFINED AT THIS JAIL WITHOUT A COMMITMENT ORDER FROM 6-15-18 TO 7-14-18 WHICH RESULTS IN A VIOLATION OF MY STATE AND FEDERAL CONSTITUTIONAL RIGHTS. "WHY?"

Step 3 - Warden and/or Designees: (Must respond within 10 business days)

NO CHANGES TO STAFF 1 OR 2 (RESPONSES)

☒ Denied☐ Granted☐ Deferred for a Formal Hearing☐ Damages Awarded * Amount \$

Signature

Date

Signature

Date

Franklin County Jail

Inmate Grievance Form

Step 1 – Correctional Treatment Specialist Response: (Must respond within 10 business days)

This should be addressed via the courts / your attorney, however, your concern was forwarded to Records for review.

Signature [Signature] Date 7/27/18

☒ Decision Appealed by Inmate K. COMBS (Date) 7/30/18

REC 8/2/18 MIN

Explain why:

BECAUSE THE GRIEVANCE RESPONSE IS UNCLEAR, EVASIVE, AND VAGUE. WHY IS IT THAT NO SUPERVISORY OFFICIAL OF THIS JAIL WILL ADDRESS WHY AN EMPLOYEE OF THE JAIL LIES IN HER WRITTEN RESPONSE TO COVER-UP THE FACT THAT I WAS CONFINED HERE WITHOUT A COMMITMENT ORDER, IN VIOLATION OF MY RIGHTS.

Step 2 – Deputy Wardens Responses or Designees: (Must respond within 10 business days)

No change to above

Signature [Signature] Date 8/5/18

Signature _____ Date _____

☒ Decision Appealed by Inmate K. COMBS (Date) 8/6/18

REC 8/8/18 MIN

Explain why:

BECAUSE THE GRIEVANCE RESPONSE IS UNCLEAR, EVASIVE AND VAGUE. WHY IS IT THAT NO SUPERVISORY OFFICIAL OF THIS JAIL WILL ADDRESS WHY AN EMPLOYEE OF THE JAIL LIES IN HER WRITTEN RESPONSE TO COVER-UP THE FACT THAT I WAS CONFINED HERE WITHOUT A COMMITMENT ORDER, IN VIOLATION OF MY RIGHTS.

Step 3 – Warden and/or Designees: (Must respond within 10 business days)

NO CHANGES TO STEP 1 OR 2 RESPONSES

☐ Denied ☒ Granted ☐ Deferred for a Formal Hearing ☐ Damages Awarded * Amount \$ _____

Signature [Signature] Date 8/13/18

Signature _____ Date _____

Franklin County Jail

Inmate Grievance Form

For Official Use Only

18-00725

Grievance Number

Pg. 1 of 2

Inmate Name:

Date:

KEVIN COMBS

7-11-18

Signature:

Housing Location (Unit & Cell):

D-13

Grievance Issues: (Check all that Apply)

- ☒ Alleged violation of civil or constitutional rights
☒ Alleged violation of jail policy
☒ Alleged criminal or prohibited act by a staff member
☐ Alleged condition existing within the facility that creates unsafe or unsanitary conditions
☐ Dispute about the assessment of a specific fee or service charge

Instructions:

1. No grievance shall be considered that deals with the amount of your bond, matters concerning your court case, probation and parole decisions, disciplinary hearings and classification hearings. No grievance will be entertained from a group or representative of any group. All grievances will be on an individual basis.
2. Grievances must be filed within five (5) days after a potential grievable event has occurred.
3. State grievance completely and thoroughly. Grievance Form will be returned to you if it is not completed properly.
4. Grievances containing obscene language, threats or vulgar remarks will not be accepted. Inmates may be subject to disciplinary action for remarks made within the grievance and no immunity will be afforded to any inmate from civil or criminal liability for any of their acts or statements.

Statement of Grievance: Additional paper may be used, maximum of two pages. (One Inmate Grievance Form and one one-sided 8 1/2 x 11 page)

I HAVE SUBMITTED MULTIPLE INMATE REQUEST AND COMPLAINTS TO THE RECORDS DEPT. REQUESTING TO BE FURNISHED COPIES OF A VALID COMMITMENT ORDER AUTHORIZING MY CONFINEMENT AT THIS FACILITY. IT IS MY POSITION THAT I AM UNLAWFULLY CONFINED, AND NO LAWFUL COMMITMENT ORDER CURRENTLY EXISTS AS REQUIRED BY LAW. IN RESPONSE TO MY INMATE REQUEST, ON 07/11/18, MRS. SALINDA DICKINSON OF RECORDS BLATANTLY LIED AND MISREPRESENTED IN HER RESPONSE THAT,

"WE HAVE ON FILE AN ORDER FROM JUDGE VAN HORN DATED 6/15/2018 THAT YOU ARE TO REMAIN HOUSED AT FRANKLIN CO. JAIL PENDING YOUR REQUIRED TESTIMONY ON 6/15/18."

Clearly MRS. SALINDA DICKINSON HAS LIED IN HER RESPONSE, IN AN ATTEMPT TO COVER-UP THE FACT THAT THIS INSTITUTION HAS AND CONTINUES TO HOLD ME CONFINED AT THIS INSTITUTION WITHOUT LAWFUL AUTHORITY, (MEANING A VALID COMMITMENT ORDER) → CONTINUATION

PG. 1 OF 2

List actions taken and staff you have contacted, before submitting this grievance.

REQUEST SLIP TO RECORDS DEPT. SUBMITTED ON (06/20/2018)

REQUEST SLIP TO RECORDS DEPT. SUBMITTED ON (06/27/2018)

REQUEST AND FORMAL COMPLAINT TO RECORDS DEPT. SUBMITTED ON (07/05/2018)

REQUEST AND FORMAL COMPLAINT TO WARDEN SUBMITTED ON (07/05/2018)

KEVIN COMBS
Kevin Combs

DATED: 7-11-18 pg 2 of 2
DELTA - 13

GRIEVANCE CONTINUATION

SUBJECT: RECORDS DEPARTMENT
FRAUDULENT COMMITMENT ORDER

I MAINTAIN THAT NO SUCH ORDER FROM THE HONORABLE JUDGE CAROL VAN HORN EXIST, WHICH DIRECTS THIS INSTITUTION, NOR THE FRANKLIN COUNTY SHERIFFS DEPARTMENT TO KEEP ME HOUSED AT THE FRANKLIN COUNTY JAIL PENDING MY REQUIRED TESTIMONY ON 7/13/2018.

AGAIN, I REQUEST THAT THIS FALSE/FRAUDULENT SO-CALLED ORDER BE FURNISHED TO ME.

THE FACT THAT AN EMPLOYEE OF THE FRANKLIN COUNTY JAILS RECORD DEPARTMENT HAS RESULTED TO FALSE REPRESENTATION AND LIES IN HER RESPONSE, IN AND OF ITSELF, SPEAKS TO THE UNLAWFUL CONDUCT/CONFINEMENT COMPLAINED OF HEREIN, AND IS EVIDENCE THAT MRS. SALINDA DICKINSON AND THE RECORDS DEPARTMENT AS A WHOLE IS WORKING IN CONCERT WITH OTHERS CONSPIRING TO DEPRIVE ME OF MY STATE AND FEDERAL CONSTITUTIONAL RIGHTS, UNDER COLOR OF STATE LAW.

CC: File

HAND WRITTEN COPY

PG. 2 OF 2

Name Kevin Coups

Franklin County Jail
1804 Opportunity Avenue
Chambersburg, PA 17201

HARRISBURG PA 171

27 AUG 2018 PM 3 L



RECEIVED
SCRANTON

AUG 29 2018

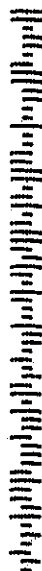
Williams J. Nealso PER

F Bid Clerks Office

235 N. Washington Ave
Scranton, PA 18503
envelope 2 of 2

DEPUTY CLERK

18503-151299



Name Kevin Coups

Franklin County Jail
1804 Opportunity Avenue
Chambersburg, PA 17201

HARRISBURG PA 171

27 AUG 2018 PM 3 L



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AUG 29 2018

Williams J. Nealson

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DEPUTY CLERK

18503-151299

